

## UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America

v.

Otaniyen Iduozee

Case No.

~~23-00000~~

24-MJ-15

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 2021 - January 2022 in the county of Waukesha in the  
Eastern District of Wisconsin, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1956(h); 18 U.S.C. §  
 1957(a); and 18 U.S.C. § 1543.

*Offense Description*

Money laundering conspiracy; money laundering—transactions over \$10,000;  
 and use of false passports.

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.

GARY M ROY

Digitally signed by GARY M ROY  
 Date: 2024.01.08 17:01:10 -06'00'

*Complainant's signature*

SA Gary Roy, DHS/HSI

*Printed name and title*

Sworn via telephone; transmitted via email  
 pursuant to Fed. R. Crim. 4.1

Date: 01/09/2024*Judge's signature*City and state: Milwaukee, Wisconsin

Hon. William E. Duffin, U.S. Magistrate Judge

*Printed name and title*

## **AFFIDAVIT**

I, Gary Roy, first being duly sworn under oath, hereby depose and state as follows:

1. I am a Special Agent with the United States Department of Homeland Security (DHS), Homeland Security Investigations (HSI) and have been so employed since approximately February of 2018. My current job responsibilities include, but are not limited to, investigation of violations of federal criminal laws involving financial fraud. In the past, I have been assigned to financial investigation groups that investigate bulk cash smuggling, money laundering offenses, and other fraud related offenses committed by criminal organizations. I have received formal training from the Federal Law Enforcement Training Center, as well as training through contact with experts from various law enforcement agencies.

2. I have received specialized training in federal financial crimes. I have participated in investigations involving large, international networks of individuals defrauding others using various electronic means, such as romance fraud-schemes, business email compromise schemes, and lottery schemes, etc. I have debriefed numerous victims of these schemes and reviewed large volumes of correspondence between victims and those perpetrating the frauds, as well as communications between co-schemers. I have also interviewed several defendants perpetrating these cyber-fraud schemes about, among other things, the methods by which victims are identified, the various roles individuals serve in the schemes, methods of communication, means of

concealing identities, and the movement and concealment of fraud-derived funds. I have also conducted physical and electronic surveillance, executed arrest and search warrants, acted in an undercover capacity, and analyzed electronic evidence, including the contents of numerous social media and email accounts controlled by individuals perpetrating fraud schemes.

3. The purpose of this affidavit is to establish probable cause that Otaniyen IDUOZEE (“IDUOZEE”) has committed violations of 18 U.S.C. § 1956(h) (money laundering conspiracy), 18 U.S.C. § 1957(a) (money laundering – transactions over \$10,000), and 18 U.S.C. § 1543 (use of false passports). The facts in this affidavit are known to me through my personal knowledge, training, experience, and through information provided to me by other law enforcement officers in the course of their official duties, whom I consider truthful and reliable. This affidavit is intended to show merely that there is sufficient probable cause for the complaint and does not set forth all of my knowledge about this matter.

#### **RELEVANT SECTIONS OF LAW**

4. Title 18, United States Code, Section 1956(h) states in part: “Any person who conspires to commit any offense defined in this section or section 1957 shall be subject to the same penalties as those prescribed for the offense the commission of which was the object of the conspiracy.” As relevant here, Title 18, United States Code, Section 1956(a)(1)(B)(i) states in part: “Whoever, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducts or attempts to conduct such a financial transaction which in fact involves

the proceeds of specified unlawful activity – ... knowing that the transaction is designed in whole or in part – ... to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity ... shall be sentenced to a fine ... or imprisonment for not more than twenty years.” And Title 18, United States Code, Section 1956(a)(2)(B)(i) states in part: “Whoever transports, transmits, or transfers, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States ... knowing that the monetary instrument or funds involved in the transportation, transmission, or transfer represent the proceeds of some form of unlawful activity and knowing that such transportation, transmission, or transfer is designed in whole or in part – ... to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of specified unlawful activity ... shall be sentenced to a fine ... or imprisonment for not more than twenty years.”

5. As relevant here, Title 18, United States Code, Section 1957(a) states that whoever “knowingly engages or attempts to engage in a monetary transaction in criminally derived property of a value greater than \$10,000 [that] is derived from specified unlawful activity” shall be fined or sentenced to imprisonment for not more than ten years.

6. As relevant here, Title 18, United States Code, Section 1543 states that whoever “willfully and knowingly uses, or attempts to use, or furnishes to another for use any such false, forged, counterfeited, mutilated, or altered passport or instrument

purporting to be a passport,” shall be fined or sentenced to imprisonment for not more than ten years.

### **PROBABLE CAUSE**

7. In October 2022, your affiant received information from Legal Action of Wisconsin, a nonprofit agency that provides free legal services, regarding E.S., a 64-year-old resident of New Berlin, Wisconsin, who had fallen victim to a “romance scam” financial fraud scheme. In my training and experience, romance scam fraud schemes involve scammers who purport to be in romantic relationships with their targets, who are often elderly. After earning the victims’ trust and loyalty, the scammers begin to ask for money, falsely claiming that they need money for some legitimate purpose — often to unlock some greater source of funds.

8. On or about October 25, 2022, I interviewed E.S., who stated she had met an individual who had presented themselves as Anthony WILLIAMS (“WILLIAMS”) on the online dating website called OurTime, which is geared to people over 50 years old, in or around November 2021. WILLIAMS told E.S. that he was a geophysicist and had contracted with the company Conoco Phillips to work on a project on an oil rig in the Gulf of Mexico. E.S. believed WILLIAMS was a real person, and their communications were romantic in nature, and extensive.

9. Between approximately December 2021 to May 2022, WILLIAMS would constantly ask E.S. for money, initially claiming the money was to pay taxes to a foreign bank located in England in order to access his own money within the bank. He also asked for money to pay for equipment needed for the engineering project and for food.

WILLIAMS sent E.S. fake documentation to support his requests. For example, he sent E.S. a document that purported to be a contract he had signed with Conoco Phillips detailing the specifics of his project, how much he was to be paid, and the time period he would be working in the Gulf of Mexico. WILLIAMS also e-mailed E.S. promissory notes indicating he would pay the money back in full.

10. Throughout the course of their correspondence, E.S. sent WILLIAMS over \$1.5 million via cashier's checks, wire transfers, crypto currency transfers and purchasing GreenDot cards from Walmart, all pursuant to WILLIAMS's instructions.

11. In or about May 2022, E.S. told WILLIAMS she was completely out of money. WILLIAMS attempted to convince her to find other means to find money, but E.S. reiterated she had no more money to give. E.S. stated that on or about May 11, 2022, she received a text from an unknown number. The person using the number identified themselves as RANDELL and a member of WILLIAMS's work crew. RANDELL told E.S. that WILLIAMS had quite abruptly committed suicide by casting himself into the Gulf of Mexico.

12. After receiving the text from RANDELL, E.S. filed a report with the New Berlin Police Department notifying them she had been the victim of a financial fraud scheme. Detective ("Det.") Thomas Johannik was the lead local investigator for E.S.'s case.

13. On or about October 25, 2022, I met with Det. Johannik regarding the investigation. Det. Johannik provided me a copy of E.S.'s conversations with WILLIAMS and copies of wire transfer receipts. I observed in the text conversations

that WILLIAMS instructed E.S. to send money in numerous different ways. More than once, he told E.S. to wire money to individual bank accounts, providing E.S. with specific bank account numbers and names in which to make the money transfers out to.

14. For example, on December 10 and December 13, 2021, WILLIAMS instructed E.S. to send approximately \$90,000 to a Mazi GABBY at Chase Bank account 779007712. WILLIAMS told E.S. this money was to pay for a foreign bank tax, which would allow WILLIAMS to access his United Kingdom bank account, which contained money he could (allegedly) use to pay back E.S.

15. According to records received from Chase Bank, the Mazi GABBY account was opened at a Chase branch in the Miami, FL area. The signer and sole owner of the account is listed as Mazi GABBY, who used a Kenyan passport as the sole means of identification. Records listed GABBY's address as 19773 NW 52<sup>nd</sup> Pl, Opa Locka, FL 33055. In the statement period during which E.S. sent approximately \$90,000 at the instruction of WILLIAMS, Mazi GABBY received credits totaling approximately \$447,195.47 and withdrawals totaling approximately \$446,390. Your affiant observed that the majority of the credits came from individuals from California, Florida, and Wisconsin. These individuals were later determined to be victims of a romance scam similar to what E.S. experienced.

16. I then ran records checks of the Opa Locka, FL address. Records showed that on or about August 10, 2022, Customs and Border Protection (CBP) in Miami, FL seized a parcel originating from Lagos, Nigeria with an intended recipient of Rawlings BROWN at 19773 NW 52<sup>nd</sup> Pl., Opa Locka, FL. CBP inspected the parcel, which

contained a Kenyan passport that CBP determined to be fraudulent. I reviewed the Kenyan passport, which bore the name David ETHAN. The photo of David ETHAN has the same likeness and appearance as Mazi GABBY's Kenyan passport photo.

17. CBP also informed me they had seized other Kenyan passports similar to the ETHAN passport. On or about September 22, 2022, CBP seized a parcel shipped from Lagos, Nigeria with an intended recipient of Ethan MAZI at 15840 SW 102<sup>nd</sup> Ave, Miami, FL 33157. The parcel contained a Kenyan passport which bore the name Ethan MAZI. Your affiant reviewed the Kenyan passport and observed the photo of Ethan MAZI bore the same likeness and appearance to both Mazi GABBY and David ETHAN.

18. I conducted law enforcement records checks of 15840 SW 102<sup>nd</sup> Ave, Miami, FL, 33157. Official immigration records revealed that OTANIYEN IDUOZEE listed the 102<sup>nd</sup> Ave address as his primary residence. I reviewed IDUOZEE's official government records and observed that the photos of IDUOZEE on his records bore the same likeness and appearance as the photos on the GABBY, MAZI, and ETHAN passports.

19. Database queries show that IDUOZEE is a citizen and national of Nigeria. Records show that at the time CBP seized the fraudulent Kenyan passports, IDUOZEE held an F-1 student visa. As of the writing of this affidavit, I have learned that IDUOZEE is currently seeking naturalization through marriage to a United States Citizen.

20. On or about December 8, 2021, WILLIAMS instructed E.S. to send approximately \$69,000 into Chase bank account 778822152 with the account holder



Robert WUDI. WILLIAMS told E.S. this money was to pay for supplies for the oil rig, to pay a boat fee to ship supplies from the mainland, and to pay for a new foreign bank tax fee. As a way to prove his authenticity, WILLIAMS sent E.S. a promissory note which stated E.S. would be paid back in full.

21. According to records received from Chase Bank, the Robert WUDI account was opened at a Chase Bank in Cooper City, FL. The signer and sole owner of the account is listed as Robert WUDI, who used a Kenyan passport as the sole means of identification. WUDI's passport photo bore a similar likeness and appearance as the photos on the GABBY, MAZI, and ETHAN passports, and to photos of IDUOZEE. Records listed WUDI's address as 19773 NW 52<sup>nd</sup> Pl, Opa Locka, FL 33055. In the statement period during which E.S. sent approximately \$69,000, Robert WUDI received credits totaling approximately \$287,779 and withdrawals totaling approximately \$286,948. I observed that the majority of the credits came from individuals in Virginia, North Carolina, Michigan, and Wisconsin. These individuals were later determined to be victims of a romance scam similar to what E.S. experienced.

22. Records show that the same day E.S.'s money was deposited into his account, WUDI withdrew approximately \$72,800. Included in those withdrawals were two ATM withdrawals from the Chase bank located at 3451 NE 1<sup>st</sup> Ave, Miami, FL.

23. Through the course of the investigation, I identified phone number 786-487-2731 as belonging to IDUOZEE. Records received from a federal search warrant show the phone has been active since August 1, 2021. The subscriber is listed as a Raymond JOHN at the address 15840 SW 102<sup>nd</sup> Ave, Miami, FL 33157. Historical cell

site data shows that on December 8, 2021, the date WUDI was withdrawing E.S.'s money, IDUOZEE's phone was connected to cellular towers in the vicinity of the Chase bank located at 3451 NE 1<sup>st</sup> Ave, Miami, FL.

24. On or about January 12, 2022, WILLIAMS instructed E.S. to send approximately \$51,000 to a Robert COLLINS at Chase bank account 787689782. WILLIAMS told E.S. the money was to be used to replace broken machinery equipment on the oil rig WILLIAMS was currently working on.

25. J.P. Morgan Chase records show that the Robert COLLINS account was opened at a Chase bank branch in Hollywood, FL. Robert COLLINS was listed as the signer and sole owner of the account. COLLINS used a Kenyan passport as the only means of identification to open the account. I reviewed the passport bearing the name Robert COLLINS and observed that the photo bore the same likeness and appearance to WUDI, GABBY, MAZI, and ETHAN, which in turn all bear the likeness and appearance of IDUOZEE. Records show that COLLINS listed his residence as 19773 NW 52<sup>nd</sup> Pl, Opa Locka, FL 33055. Records show that in the statement period during which E.S. sent money at the instruction of WILLIAMS, the COLLINS account received credits totaling approximately \$154,568 and withdrawals totaling approximately \$153,300.

26. On about January 12, 2022, the COLLINS Chase account received the \$51,000 from E.S., on top of credits the account had already received from other victims. Within days of receiving the funds from E.S., and before receiving any other deposits, COLLINS withdrew approximately \$130,000 in cashier's checks made out to Copart.

27. Copart is a global provider of online vehicle auction and remarketing services to automotive resellers. Copart provides these services worldwide to countries including Brazil, Spain, United Arab Emirates, Bahrain, Oman, and Nigeria.

28. Based on my training, experience, and conversations with other law enforcement entities, I know that money launderers and romance scammers utilize companies like Copart to engage in trade-based money laundering. This is accomplished when the money launderer receives money from a victim, and then uses those funds to purchase vehicles through a company like Copart. These vehicles are then exported to the country of the launderer's origin, where they are received by a co-conspirator who resells the automobiles for cash.

29. I compared the signatures COLLINS made on the Copart withdrawal slips to IDUOZEE's signature on an official government document form, IDUOZEE's I-131, Application for Travel Document. Based on the unique style of the signature, your affiant submits there is probable cause to believe both signatures are made by the same individual.

Signature on COLLINS withdrawal slip:

**CHASE** **WITHDRAWAL**

CHECKING ☐  
SAVINGS ☐  
CHASE LIQUID ☐

Today's Date **01-21-2022** Customer Name (Please Print) **ROBERT COLLINS** R/T 500001017

If Purchasing a Cashier's Check Provide Payee Name

N13061-CH (Rev 10/15) 10130658 07/21

**WITHDRAWAL**

\$ 7,000 **COPART** Customer Signature **X** **K. Collins**

\$ 7,000

\$ 4,500

\$ 4,000

\$ 2,500

▼ Start your account number here

**787689782**

AMOUNT

TOTAL \$ **25000.00**

⑈0859320133⑈ ⑆500001017⑆

©MoranChaseBank 012102 744449 964730020266

Otaniyen IDUOZEE's signature on I-131

**Spouse Beneficiary's Signature**

6.a. Spouse Beneficiary's Signature (sign in ink)

➔ **X** **K. Collins**

6.b. Date of Signature (mm/dd/yyyy) **09-26-2022**

**NOTE TO ALL SPOUSE BENEFICIARIES:** If you do not

30. Copart records show that the cashiers checks received from COLLINS were sent to 5 different companies: Almaak Automobiles and Spare, Gadanga Global Link Nig Ltd., Maunur Dynamic Ventures Ltd., Eeshmad Automobiles Ltd., and Akash General Motors Ltd. Each business has a listed address in Nigeria.


31. I also reviewed the withdrawal slips for the WUDI Chase account, which received funds from E.S. in December of 2021. I saw that in 2022, the WUDI account paid \$9,800 via cashiers check to ROBERT COLLINS. The signature on that withdrawal slip is similar to the signatures from the COLLINS account and IDUOZEE'S immigration form:

**CHASE** **WITHDRAWAL/RETIRO**

CHECKING/CHEQUES ☐  
SAVINGS/AHORROS ☐  
CHASE LIQUID ☐

Today's Date / Fecha **08-02-2022** Customer Name (Please Print) / Nombre del cliente (en letra de molde) **ROBERT WUDI**  
R/T 500001017  
If Purchasing a Cashier's Check Provide Payee Name / Si desea comprar un cheque de caja, escriba el nombre del beneficiario aquí  
**ROBERT COLLINS**

N13063-CH (Rev 10/15) 20004301 01/22

**WITHDRAWAL/RETIRO** \$ **9800** Customer Signature / Firma del cliente **X** 

Start your account number here /  
▼ Emplace su número de cuenta aquí **839211700**

AMOUNT/CANTIDAD **TOTAL \$ 9800.00**

⑈0593435092⑈ ⑆500001017⑆

32. I also reviewed the signatures appearing on withdrawal slips for the GABBY Chase account, which received funds from E.S. on December 13, 2021. I compared the signatures on some of the GABBY withdrawal slips to IDUOZEE'S signature on his I-131, Application for Travel Document. Again, these appeared to be made by the same individual. An example of the signatures follows:

Signature on GABBY withdrawal slip:

**CHASE** **WITHDRAWAL**

CHECKING ☐  
SAVINGS ☐  
CHASE LIQUID ☐

Today's Date **22-01-2022** Customer Name (Please Print) **MAZI GABBY** R/T 500001017

If Purchasing a Cashier's Check Provide Payee Name

NI3061-CH (Rev. 10/15) 10130656 07/21

**WITHDRAWAL** \$9900 **COPART** Customer Signature **X** **[Signature]**

\$5800  
\$3600  
\$1800  
\$1670  
\$2030

▼ Start your account number here **779007712** AMOUNT **TOTAL \$ 24800.00**

⑈0859320135⑈ ⑆500001017⑆

©MoranChaseBank 012405 741746 938560069817

Otaniyen IDUOZEE's signature on I-131

*Spouse Beneficiary's Signature*

6.a. Spouse Beneficiary's Signature (sign in ink)

➔ **[Signature]**

6.b. Date of Signature (mm/dd/yyyy) **09-26-2022**

**NOTE TO ALL SPOUSE BENEFICIARIES:** If you do not

33. Not all of the signatures on the GABBY account withdrawal slips are identical. Nonetheless, the evidence described above causes me to believe that IDUOZEE substantially controls the GABBY Chase account that received E.S.'s funds.

34. Through the course of the investigation, I learned that Robert COLLINS also opened a Wells Fargo bank account, numbered 1646809879. Wells Fargo records

show that the account was opened by the same COLLINS who received E.S.'s funds in his Chase account, using the same Kenyan passport and the same address of 19773 NW 52<sup>nd</sup> Pl, Opa Locka, FL 33055. The COLLINS Wells Fargo account was opened at a bank branch located on the campus of Florida International University on March 3, 2022, and immigration records show that IDUOZEE was scheduled to complete his studies at Florida International University on August 23, 2024.

35. The Wells Fargo records also included multiple bank video and still images. I reviewed both video and still images, which show COLLINS accessing his account and making transactions. I observed that the video and images of COLLINS bear the same likeness and appearance of IDUOZEE, as IDUOZEE appears on official government documents such as his state-issued driver's license. The man in the video can be seen making multiple transactions in a single visit—for example, first accessing the ATM, and then walking into the bank to transact with a teller—and scrolling through his phone before each transaction, as if he is looking for information relevant to multiple accounts or transactions.

36. As of the writing of this affidavit, a grand jury sitting in the Eastern District of Wisconsin has indicted two defendants, John and Shedrack Umukoro, for their roles in laundering money stolen from E.S. *See United States v. Umukoro*, 23-cr-98. John and Shedrack Umukoro are currently charged with conspiracy to launder E.S.'s money, in violation of 18 U.S.C. §§ 1956(h), 1956(a)(1)(B)(i), and 1956(a)(2)(B)(i).

37. I believe that Shedrack and/or John Umukoro were directly involved in WILLIAMS's correspondence with E.S., including instructing E.S. to send funds to accounts controlled by IDUOZEE, as described above. For example:

- a. John Umukoro's personal email address is linked to "WILLIAMS's" email addresses in multiple ways; most notably, they share the same recovery email address.
- b. On December 10, 2021, Shedrack Umukoro received a text message from L.U. stating, "Your brother tell me say e collect 1h." Shedrack clarified, "100k?" L.U. stated, "Yes." The same day, WILLIAMS instructed E.S. to send approximately \$90,000 to the Mazi GABBY Chase Bank account controlled by IDUOZEE, as described above, followed by another \$7,300 transfer to a different account the next day.
- c. "WILLIAMS" at one point sent E.S. a flight itinerary, purchased through Priceline, to substantiate his claim that he would visit her in Wisconsin. (He never actually visited her.) The same Priceline account belonging to "WILLIAMS" also purchased tickets on another occasion, using an IP address belonging to the Fairfield Inn and Suites in Duluth, GA. At the time those tickets were purchased, Fairfield Inn and Suites records reveal that John Umukoro was a guest at the hotel.
- d. Shedrack Umukoro's personal computer contained a draft letter to a fraud victim reflecting a story very similar to "WILLIAMS's," describing work



for Conoco Phillips and justifying requests for money (including for food), and alluding to having met on a dating website.

- e. Shedrack Umukoro's phone and computer maintained the information for the User Account [anthon\\_williams63@yahoo.com](mailto:anthon_williams63@yahoo.com).

38. Shedrack Umukoro is in custody, but John Umukoro has been a fugitive for over six months, and he is taking active steps to avoid detection. As a result, I believe it is reasonable to conclude that IDUOZEE may be aware of law enforcement's efforts to investigate and dismantle this fraud and money-laundering organization.

39. On or about October 27, 2023, IDUOZEE left the United States, flying to Nigeria from Houston, Texas. I have received information that IDUOZEE is scheduled to return to the United States from Nigeria and will arrive at the Hartsfield – Jackson International Airport in Atlanta, GA on January 10, 2024. I believe this presents the best, safest, and indeed, perhaps only opportunity to bring to him to justice.

40. The scheme remains ongoing; I am aware of multiple other victims in very recent communication with a romance-scammer using the same modus operandi as WILLIAMS did with E.S. Many of these victims genuinely believe they are in a relationship with the romance scammer even after approached by law enforcement, and they continue to send money demanded by the scammer. Based on my interviews with other victims who have sent money to accounts controlled or accessed by IDUOZEE, I believe IDUOZEE is connected to over \$5 million in laundered funds.

41. Based on the foregoing, your affiant submits there is probable cause to believe Otaniyen IDUOZEE has violated the federal criminal statutes cited herein.